



Driving progress  
through partnership

Melissa A. Geist

Direct Phone: +1 609 514 5978

Email: mgeist@reedsmith.com

Reed Smith LLP  
506 Carnegie Center  
Suite 300  
Princeton, NJ 08540-7839  
+1 609 987 0050  
Fax +1 609 951 0824  
reedsmith.com

May 16, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
Frank Lautenberg Post Office & U.S. Courthouse  
2 Federal Plaza, 3rd Floor  
Newark, New Jersey 07102

**Re: In re: Insulin Pricing Litigation, No. 2:23-md-03080-BRM-RLS**  
**Defendants' Request for Additional Pages re Constructive Notice Response**

Dear Judge Martinotti:

Defendants write regarding the page limits for their constructive notice response brief.

The Court ordered that Plaintiffs, in the aggregate, would have 30 pages for opening briefs and 20 pages for response briefs. The Court ordered the same for Defendants. *See* ECF 513. On May 2, 2025, Plaintiffs sought leave to file an extra 2.5 pages in their opening briefs. Defendants did not oppose, and the Court so-ordered Plaintiffs' request. *See* ECF 541. In their request for leave, Plaintiffs stated: "We have no objections to Defendants having a comparable addition if needed."

Each Defendant Group seeks the Court's leave to file an additional two (2) pages of briefing in their constructive notice response briefs, meaning two (2) additional pages for the Manufacturers' response brief and two (2) additional pages for the PBMs' response brief. If the foregoing request is acceptable to Your Honor, we respectfully request that this letter be "So Ordered" and entered on the docket. Thank you for your time and attention.

SO ORDERED:

Respectfully submitted,

*Brian R. Martinotti*

BRIAN R. MARTINOTTI, USDJ

DATED: MAY 19, 2025

/s/ Melissa Geist

Melissa Geist

cc: All Counsel of Record (via ECF)